

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

Brian Musgrave,)	Civil Action No.: 2:25-cv-01823-RMG
)	
Plaintiff,)	
)	
v.)	
)	
)	
Nancy Mace and Jane/John Does 1-5,)	
)	
Defendants.)	
)	

DEFENDANTS' CONSENT MOTION TO EXTEND RESPONSE DEADLINE

Pursuant to Federal Rule of Civil Procedure 6(b)(1)(A) and Local Civil Rule 6.01 (D.S.C.)—and with Plaintiff’s consent—Defendants respectfully move for a twenty-five (25) day extension of time (through July 11, 2025) to respond to Plaintiff’s pleading. Although the United States is not currently a defendant in this action, Defendants are represented by undersigned counsel from the United States Attorney’s Office for the District of South Carolina. *See* ECF Nos. 9, 11. In support of this motion, Defendants state as follows:

1. Defendants’ current deadline to respond to Plaintiff’s Complaint (ECF No. 1) is June 16, 2025. *See* ECF No. 10.

2. The deadline for Defendants’ response has been extended once. Pursuant to Local Civil Rule 12.01 (D.S.C.), Plaintiff agreed to a 20-day extension of the deadline until June 16, 2025, for Defendants to respond to the Complaint. *See* ECF No. 10.

3. However, on June 9, 2025, Plaintiff filed a Notice of Motion and Motion to Amend the Complaint (Plaintiff’s Motion) with Defendants’ consent. *See* ECF No. 16. If the Court grants Plaintiff’s Motion, Defendants will be required to file their response to the Amended Complaint “within the time remaining to respond to the original pleading or within 14 days after service of

the amended pleading, whichever is later[,]” “[u]nless the court orders otherwise” Fed. R. Civ. P. 15(a)(3). As of the date of this filing, Plaintiff’s Motion is still pending.

4. Defendants respectfully request an extension of time until July 11, 2025, to respond to Plaintiff’s pleading. If this Court grants Plaintiff’s Motion and docket the Amended Complaint, this extension will allow adequate time for undersigned counsel to review the new allegations and discuss them with the House of Representatives to determine the proper response.

5. Defendants’ request will not affect any other deadlines.

6. Pursuant to Local Civil Rule 7.02 (D.S.C.), the undersigned counsel consulted with counsel for Plaintiff prior to filing this motion. Counsel for Plaintiff consents to this request.

Respectfully submitted,

BRYAN P. STIRLING
UNITED STATES ATTORNEY

s/Kimberly V. Hamlett
Kimberly V. Hamlett (#14049)
Assistant United States Attorney
United States Attorney’s Office
151 Meeting Street, Suite 200
Charleston, South Carolina 29401
Phone: (843) 266-1673
Email: Kimberly.Hamlett@usdoj.gov

s/Robert M. Sneed
Robert M. Sneed (#07437)
Assistant United States Attorney
United States Attorney’s Office
55 Beattie Place, Suite 700
Greenville, South Carolina 29601
Phone: (864) 282-2100
Email: Robert.Sneed@usdoj.gov

June 11, 2025